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Denise Subramaniam
Self-represented
13865 SW Walker Rd
Beaverton OR 97005
503-764-5300

**UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION**

LNV CORPORATION

Plaintiff,

v.

DENISE SUBRAMANIAM

pro per

Defendant

Civil Case No. 3:14-cv-01836

**DEFENDANT'S MOTION FOR
EXTENSION OF STAY
FOR MEDICAL NEED**

DEFENDANT'S MOTION FOR EXTENSION OF STAY FOR MEDICAL NEED

1. Here comes Defendant Denise Subramaniam, representing herself, and hereby motions this court for an extension of the April 7, 2015 stay ordered by the court and states the following:
2. Surgery was performed on Defendant on March 17, 2015. A photograph of the incision taken approximately a week afterwards is attached as Defendant's Exhibit A herein. Also attached herein is Defendant's affidavit in support of this motion.
3. Defendant has been, and continues to be, unable to function sufficiently to defend herself in this matter. She was incapacitated for approximately two weeks by the strong painkillers and other medications prescribed after surgery. See Defendant's Exhibit B attached herein.
4. Defendant cannot sit or stand for periods longer than twenty (20) minutes at a time, and cannot drive until the effect of the drugs wears off, and her neck muscles heal sufficiently.

5. Due to these conditions Defendant only realized on Thursday April 2, 2015 that the April 7, 2015 deadline was looming. Friday April 3, 2015 was Good Friday. With her medical limitations preparation of this motion and its exhibits were time consuming and painful, and it was impossible to get anything from her physicians for the court within this time frame.

6. A denial of an extension of the stay sufficient enough for her to recover from her surgery so she can perform the tasks required to research, write and file legal documents pertinent to her defense would amount to a denial of her right to due process and equal protection of law under the fifth and fourteenth amendment of the Constitution of the United States.

7. Defendant's first post-operative examination by her surgeon is scheduled for April 27, 2015. THEREFORE Defendant motions for an extension of the stay until after this date.

PRAYER

8. **WHEREFORE** Defendant prays this court grant for due cause an extension of the stay from April 7, 2015 to at least May 4, 2015. This would allow Defendant's surgeon, Dr. Sandquist, time to assess her recovery status and determine whether more time is required for recovery; and can accordingly provide the court with an affidavit if required at that time.

Respectfully,


Denise Subramaniam